RED ANGUS
ASSOCIATION OF AMERICA
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January 4, 2006

Marty O'Conner
Chief, Standardization Branch
USDA AMS
Room 2603 South Building
1400 Independence Ave., S.W.
Washington, DC 20250-0254

Dear Marty,

Thank you for hosting the recent comment session in Kansas City, and providing the opportunity for the Red Angus Association of America (RAAA) to express its position as regards the use of DNA Verification to identify cattle to supply Angus product lines. In listening to, and rereading the dissenting opinions expressed by some breed associations, it seems those opposed misunderstood the issue. The RAAA would like to take this opportunity to restate that issue:

RAAA, as a breed association registering Angus cattle, has made a formal application to Standardization Branch of USDA AMS that DNA verification be added as an independent option to Method 1 Genotype of Schedule GLA for identification of generic Angus cattle.

Several breed associations presented arguments in Kansas City that this issue was about an independent (profit motivated) company attempting to circumvent breed associations and establish their own parameters of what constitutes a particular breed. However, it was RAAA, a not for profit member organization, that submitted the application in a letter to you dated September 19, 2005.

It is also worth noting that RAAA is the only beef breed association that currently utilizes Method 1 genotype to identify cattle to supply Angus product lines. As our application does not suggest that DNA verification should supplant Method 2, Phenotype, we fail to see how the addition of DNA verification to Method 1, Genotype, might adversely affect those breeds not using a genotypic standard to identify their respective breed.

Conversely, one could easily argue that the more heavily used phenotypic spec has opened the doors for independent companies to make Angus products from any black hided cattle. During the 2002-03 USDA comment period regarding breed claims, the RAAA's position was that Angus products should be supplied by cattle that are derived from Angus genetics. The other Angus association, American Angus, suggested that Angus products be supplied by cattle that were only black hided and met minimum carcass specifications. The Phenotypic standard, as it is currently utilized, falls short in these areas.

- It excludes from fair market access, Red hided cattle that are 50% or greater Angus.

- It makes eligible black hided, Simmental, Gelbvieh, Limousin, South Devon, Salers, and some 15+ other purebred beef breeds that have a black hide as standard equipment.
- It has allowed companies to submit and have approved Angus product lines for every USDA quality grade – all the way down to "Utility", so long as they are supplied by a black hided animal.
- "Angus" has become a commodity through the explosive growth of Angus product lines, which now number in excess of 45, and can be found in fast food chains and convenience stores, despite not having any guarantee of containing beef derived from Angus cattle.

It seems the dissenting breeds' concern, that DNA verification would enable independent companies to specify breed determination for their own selfish gains, is exactly the reality that has played out through their collective use of Method 2, Phenotype of schedule GLA.

I saw a picture of a beef animal that would qualify for both Hereford (51% white face) and Angus (51% black hide). While dual genetic eligibility would certainly be possible when crossing Angus with Hereford, the particular animal was a purebred Simmental on the American Simmental Association's website. No Angus, no Hereford...yet eligible for those product lines through the phenotypic method.

While there will probably be continued effort to misdirect this issue towards that of profit-minded companies circumventing breed associations, we respectfully request that USDA AMS review the issue at hand: RAAA's application to include DNA verification as a separate means of genotypically identifying Angus. And, while we certainly find the phenotypic method to be the most fallible of all methods (currently utilized or proposed), our application makes no reference to any changes or reductions in use of the phenotypic method, or the products supplied through its utilization.

Thank you again for reviewing this issue as it was originally presented, and best wishes to you and the folks at USDA AMS for a joyful new year.

Yours truly,

Dr. R.L. "Bob" Hough
Executive Secretary, Red Angus Association of America

Greg Comstock,
Marketing Programs Coordinator, Red Angus Association of America

Cc: Barry Carpenter, Deputy Administrator, USDA Livestock and Seed Programs
William Sessions, Associate Deputy Administrator, USDA Livestock and Seed Programs
Jim Riva, Chief, ARC Branch, USDA AMS